

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JAMES GREENE, JENNIFER SHAAL, OFER
SHAAL, JAKE STONE, GUY SHOSHAN, EINAT
EZRA MICHAELI, and YIFAT SHMILOVICH, on
behalf of themselves and all others similarly situated,

Plaintiffs,

v.

KABBALAH CENTRE INTERNATIONAL,
INCORPORATED; KABBALAH CENTRES OF
THE UNITED STATES, INCORPORATED;
KABBALAH CENTRE OF NEW YORK,
INCORPORATED; THE KABBALAH CENTRE OF
FLORIDA, INC.; KABBALAH CHILDREN'S
ACADEMY; KABBALAH ENTERPRISES,
INCORPORATED; KAF INVESTMENTS, LLC; 501
N. LA CIENEGA, LLC; SPIRITUALITY FOR KIDS
INTERNATIONAL, INC.; and KAREN BERG,
YEHUDA BERG, and MICHAEL BERG,

Defendants.

No. 19-cv-4304 (ILG)(SJB)

**NOTICE OF MOTION TO COMPEL
ARBITRATION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and Declaration of Elise M. Bloom, Esq. with the exhibits annexed thereto, and all of the prior pleadings and proceedings in this action, Defendants Kabbalah Centre International, Incorporated; Kabbalah Centres of the United States, Incorporated; Kabbalah Centre of New York, Incorporated; The Kabbalah Centre of Florida, Inc.; Kabbalah Children's Academy; Kabbalah Enterprises, Incorporated; KAF Investments, LLC; 501 N. La Cienega, LLC; Spirituality for Kids International, Inc.; Karen Berg, Michael Berg and Yehuda Berg (collectively, "Defendants"), through their respective undersigned counsel, will move this Court, before the Honorable I. Leo Glasser, United States District Judge, on such date as the Court will

determine, at 225 Cadman Plaza East, Brooklyn, New York 11201, for an Order, pursuant to the Federal Arbitration Act, 9 U.S.C. §§ 3 and 4: (i) compelling Plaintiffs Jennifer Shaal, Ofer Shaal, Jake Stone, Guy Shoshan, and Yifat Shmilovich (the “Arbitration Plaintiffs”) to arbitrate their claims pled in the Amended Complaint; and (ii) dismissing this action as to the Arbitration Plaintiffs because all of their claims are subject to arbitration.

Dated: New York, New York
November 25, 2019

PROSKAUER ROSE LLP

SHAPIRO ARATO BACH LLP

/s/ Elise M. Bloom

Elise M. Bloom
Steven D. Hurd
Pinchos N. Goldberg
Samantha R. Manelin

Eleven Times Square
New York, New York 10036
(T) 212.969.3000
(F) 212.969.2900
ebloom@proskauer.com
shurd@proskauer.com
pgoldberg@proskauer.com
smanelin@proskauer.com

/s/ Jonathan P. Bach

Jonathan P. Bach

500 Fifth Avenue, 40th Floor
New York, New York 10110
(T) 212.257.4880
(F) 212.202.6417
jbach@shapiroarato.com

*Attorneys for Defendants
Karen Berg and Michael Berg*

*Attorneys for Defendants Kabbalah Centre
International, Incorporated; Kabbalah
Centres of the United States, Incorporated;
Kabbalah Centre of New York, Incorporated;
The Kabbalah Centre of Florida, Inc.;
Kabbalah Children's Academy; Kabbalah
Enterprises, Incorporated; KAF Investments,
LLC; 501 N. La Cienega, LLC; and
Spirituality for Kids International, Inc.*

LAW OFFICE OF JOHN D. CLINE

/s/ John D. Cline

John D. Cline

50 California Street, Suite 1500

San Francisco, California 94111

(T) 415.662.2260

(F) 415.662.2263

cline@johndclinelaw.com

Attorneys for Defendant

Yehuda Berg